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September 17, 2012

**VIA ECF**

Hon. Joseph E. Irenas, U.S.D.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza  
Camden, NJ 08101

RE: *Brady, et al. v. ALPA*  
Civil Action No. 02-2917

Dear Judge Irenas:

Plaintiffs submit this letter in response to ALPA's letter of today's date. Putting aside the numerous factual inaccuracies contained in its letter, ALPA in essence requests an emergent discovery conference for Plaintiffs' alleged attempt to "sand bag the defense in the conduct of discovery." ALPA's complaints and attempt to get this Court to intervene is nothing short of incredible and, in Plaintiffs' view, do not warrant a discovery conference.

With the exception of federal income tax returns which will be produced prior to the commencement of depositions, the Class Representatives have produced all responsive documents in their possession. In particular, the Class Representatives have produced W2 forms for years 2002 to 2011, which reflect their income earnings since the imposition of Supplement CC, as well furlough notices in their possession. It is unclear what additional documents ALPA would have the Class Representatives produce, when ALPA has been told that the Class Representatives are not in possession of other responsive

documents. As such, there is simply no need for a discovery conference on the issues raised in ALPA's letter.

Respectfully submitted,

*s/ Lisa J. Rodriguez*

Lisa J. Rodriguez

Enclosure

cc: Steve Fram (via email)  
Dan Katz (via email)  
Allen Press (via email)  
Joe Jacobson (via email)